

UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

*Pursuant to Section 2 of the Foreign Agents  
Registration Act of 1938, as Amended*

29 JUL 1982

For Six Month Period Ending \_\_\_\_\_  
(Insert date)

Name of Registrant

Registration No.

DEVELOPMENT COUNSELLORS INT'L. LTD.

1421

Business Address of Registrant

733 Third Ave. - Suite 2100  
New York, N. Y. 10017

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in Item 1.

Not applicable

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection  
Ended

Not applicable

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☐ Yes ☒ No

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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Not applicable

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5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? ☐ Yes ☒ No

If yes, identify each such person and describe his services.

Not applicable

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6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period?  
Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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Not applicable

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7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?  
Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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Not applicable

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## II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

*Name of foreign principal*

*Date of Termination*

Not applicable.

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9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

ICD AUSTRIA (Industrial Cooperation & Development Co.)

7/28/82

Schellinggasse 7/2

A-1010 Vienna, Austria

MINISTERE DE L'ECONOMIE NATIONALE

6/30/82

19-21 Boulevard Royal, Luxembourg, Grand Duchy of Luxembourg

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10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

Glenrothes Development Corporation

Netherlands Antilles Economic Mission

Newfoundland Dept. of Industrial Development

Trinidad & Tobago IDC

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## III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

Glenrothes Development Corp. - Publicized & informed U. S. businessmen about opportunities in Scotland via press releases and mailings.

Netherlands Antilles - Publicized & informed U.S. businessmen about opportunities in NA via ads & press releases.

Newfoundland - Publicized & informed U.S. businessmen about opportunities in Newfoundland via releases.

Trinidad & Tabago - Provided consulting assistance only to the client with special reference to developing an opinion poll in Canada & possible in the U.S. of executive attitudes toward Trinidad & Tobago in the perspective of the Carribean.

Luxembourg - Publicized & informed U. S. Businessmen about opportunities in Luxembourg via press releases & mailings; provided consulting assistance.

Austria - Provided consulting assistance re projected meetings.

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<sup>1</sup> The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

The activities engaged in have been detailed in Question 11 of this report (also detailed are the clients involved).

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

Not applicable.

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<sup>2</sup> The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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(See attached listing of receipts from Foreign Principals)

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Total

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14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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Not applicable.

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<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

<sup>4</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement? Yes ☒ No ☐

(2) transmitted monies to any such foreign principal? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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(See attached listing of cash disbursements of monies for foreign principals.)

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Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
Not applicable.				

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
Not applicable.			

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V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

NETHERLANDS ANTILLES  
NEWFOUNDLAND  
██████████

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<sup>5</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?  
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

Not applicable.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:  
☐ Radio or TV broadcasts ☒ Magazine or newspaper articles ☐ Motion picture films ☐ Letters or telegrams  
☒ Advertising campaigns ☒ Press releases ☐ Pamphlets or other publications ☐ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:  
☐ Public Officials ☒ Newspapers ☐ Libraries  
☐ Legislators ☒ Editors ☐ Educational institutions  
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups  
☐ Other (Specify) Area development publications

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?  
Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?  
Yes ☒ No ☐

## VI - EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup> Yes ☒ No ☐

Exhibit B<sup>7</sup> Yes ☒ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☒

If no, please attach the required amendment.

<sup>6</sup> The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup> The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6-month reporting period.

Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☒

Not applicable

If no, please attach the required amendment.

Not applicable

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

Not applicable

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

*Ted M. Levine*

Ted M. Levine - President

*Emanuel T. Ellen*  
Emanuel T. Ellen - Vice-President

Subscribed and sworn to before me at NEW YORK

this 15 day of NOVEMBER, 19 82

*Alfred A. Swento*  
ALFRED A. SWENTO (Notary or other officer)  
NOTARY PUBLIC, State of New York  
No. 41-4720103

Qualified in Queens County

Commission Expires March 30, 1984

<sup>8</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

Development Counsellors Int'l Ltd.  
733 Third Avenue-Suite 2100  
NYC, N.Y. 10017 212-687-1383

733 Third Avenue-Suite 2100

NYC, N.Y. 10017 212-687-1383

1/30/82 to 7/29/82

	1982			Less Foreign Exchange Loss:	Total Receipts	Total DCI-Cash Disbursed
Date	Details	Fee	Expenses			
2 26		6050 00	573 98		6623 98	
3 11		3025 00	275 00		3300 00	
5 14		3025 00	275 00		3300 00	
6 2		6050 00	550 00		6600 00	
17		3025 00	275 00		3300 00	
7 28		3025 00	275 00		3300 00	
				TOTAL	26423 98	
1982						
3 9	TDX Ltd.	Telephone				25 83
11	Ted M. Levine	Expenses				50 30
25	Ass'd.Messenger	Messenger				18 00
7 15	TDX Ltd.	Telephone				2 15
						96 28

Client: KEMBOURG

Development Counsellors Int'l Ltd.

U.S. Department of Justice Report

733 Third Avenue-Suite 2100

NYC, N.Y. 10017 212-687-1383

1/30/82 to 7/20/82

3	4	5
Less Foreign Exchange Loss:	Total	Total DCI-Cash Disbursed

Date Details

Fee

Expenses

Receipts

TOTAL

1982

3/11

Ted M. Levine

Expenses

56 20

Client: NETHERLANDS ANTILLES

U.S. Department of Justice Report

1/30/82 to 7/29/82

Development Counsellors Int'l Ltd

733 Third Avenue-Suite 2100

NYC, N.Y. 10017 212-687-1383

1982				Less Foreign Exchange Loss:	Total Receipts	Total DCI-Cash Disbursed
Date	Details	Fee	Expenses			
2 26		750 00	39 17		789 17	
4 1		750 00	2496 00		3246 00	
27		750 00			750 00	
5 18		750 00	734 36		1484 36	
6 2		750 00	1882 64		2632 64	
7 6		750 00	6 36		756 36	
				TOTAL	9658 53	
1982						
5 6	Ass'd. Messenger	Messenger				6 00
6	TDX Ltd.	Telephone				84
13						
13	All Amer. Photo Letter.	Photos				3 25
18	Saddle Riv. Studios	Artwork				35 00
18	Amer. Exp/Imp. Bulletin	Ad				620 50
24	TGS Graphics	Artwork				23 40
6 7	Assd. Messenger	Messenger				12 00
7	Area Development	Ad				896 75
8	Indprop Public.	Ad				646 00
24	Emanuel T. Ellensi	Expenses				27 07
7 12	" "	"				51 62
15	TDX Ltd.	Telephone				36
22	ABC News	Expense				2 00
2 17	Emanuel T. Ellen's	Expenses				59 60
3 9	" "	"				51 84
9	Assd. Messenger	Messenger				11 00
9	Conway Publications	Ad				994 50
31	Emanuel t. Ellen's	Expenses				26 11
						3467 84

Client:

NEW ENGLAND

Development Counsellors Int'l Ltd

U.S. Department of Justice Report

733 Third Avenue-Suite 2100

1/30/82 to 7/29/82

NYC, N.Y. 10017 212-687-1383

1982				Less Foreign Exchange Loss:	Total Receipts	Total DCI-Cash Disbursed
Date	Details	Fee	Expenses			
1 3 5		9166 66		1764 58	7402 08	
2 31		4583 33		914 37	3668 96	
3 5 6		4583 33		900 62	3682 71	
4 27		6500 06		1373 46	5126 60	
5						
6						
7						
8				TOTAL	10880 35	
9						
10						
11 1982						
12 2 19	Irene Cohen	Expenses				23 57
13 17	Emanuel T. Ellenis	Expenses				86 45
14 3 9	Emanuel T. Ellenis	Expenses				80 40
15 9	TDX Ltd.	Telephone				30 26
16 9	Media Distributors	Releases				346 97
17 9	York Directions	Stats				19 80
18 17	Irene Cohen	Expenses				81 35
19 31	Emanuel T. Ellenis	Expenses				130 10
20	TDX Ltd.	Telephone				54 14
21	Assd. Messenger	Messenger				6 00
22 4 28	Town Hall Calif.	Luncheon				117 50
23 7	Business Wire	Releases				70 00
24 16	Emanuel T. Ellenis	Expenses (Travel Advance)				400 00
25 5 6	Assd. Messenger	Messenger				6 00
26 10	Emanuel T. Ellenis	Calif. Expenses				360 17
27 11	Houston Chronicle	Paper				1 00
28 20	Copeland Cutler	Tickets				290 00
29 27	Emanuel T. Ellenis	Expenses				38 10
30 6 7	Assd. Messenger	Messenger				6 00
31 8	Action Computer	Production Exp.				173 65
32 8	Business Wire	Releases				120 00
33 8	Hopkins Assoc.	Art work				75 18
34	PR Newswire	Releases				160 00
35	Western Union	Releases				251 02
36 7 12	Emanuel T. Ellenis	Expenses				40 90
37 15	TDX Ltd.	Telephone				4 09
38						2972 65
39						
40						

Client: TRINIDAD & TOBAGO  
 U.S. Department of Justice Report  
1/30/82 to 7/29/82

Development Counsellors Int'l Ltd.  
 733 Third Avenue-Suite 2100  
 NYC, N.Y. 10017 212-687-1383

1982				Less Foreign Exchange Loss:	Total Receipts	Total DCI-Cash Disbursed
Date	Details	Fee	Expenses			
2 1		4200 00	47 25		4247 25	
2 26		4200 00	47 25		4247 25	
3 3 23		4200 00	17 00		4217 00	
4 4 27		4200 00	47 25		4247 25	
5 5 27		4200 00			4200 00	
6 6 8		4200 00	930 80		5130 80	
7 7 19		4200 00	510 00		4710 00	
8				TOTAL	30999 55	
11 1982						
12 2 2	Citibank Master Chg	Expenses (Ted M. Levine)				41 30
13 3 9	Assd. Messenger	Messenger				11 50
14 31	Ted M. Levine	Expenses				4 40
15 4 27	Ted M. Levine	Expenses				12 00
16 5 21	Ted M. Levine	Expenses				31 40
17 6	TDX Ltd.	Telephone				49 12
18 18	Ted M. Levine	Expenses				23 80
19 18	Pennflor Corp.	Storage				49 61
20 24	Stat House	Stats				31 72
21 24	T&T Chamber of Comm.	Luncheon				28 50
22 6 8	Brod Printing	Releases				860 00
23 8	Saddle River Studios	Artwork				38 50
24 14	T&T Ch. of Comm.	Luncheon				22 00
25 24	Ted M. Levine	Expenses				47 10
26 7 13	Ted M. Levine	Expenses				29 05
27 15	TDX Ltd.	Telephone				4 28
28 20	Brod Printing	Releases				510 00
29 20	Ted M. Levine	Expenses				21 20
30						1766 85
31						
32						
33						
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40						

UNITED STATES DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D. C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes XXXX or No                     

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes                      or No                     

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

T.M. Levine

Signature

Nov. 15, 1982

Date

Ted M. Levine  
Please type or print name of  
signatory on the line above

President  
Title

NOV 16 4 33 PM '82  
REGISTRATION UNIT